Ballew, Mary

Subject:	Cranston RCRA: develop remedy purpose and scope
Location:	CALL: 877 304 6368 attendee code: 451 87 551 Host code:451 49 320
Start:	Wed 6/28/2017 3:30 PM
End:	Wed 6/28/2017 4:30 PM
Show Time As:	Tentative
Recurrence:	(none)
Organizer:	Joseph F Guarnaccia

I would like to cover the following:

1.) develop plans using the RCRA First approach.
https://www.epa.gov/hw/toolbox-corrective-action-resource-conservation-and-recovery-act-facilities-investigation-remedy

Specifically,

- Enhance communication between BASF, the EPA and the DEP.
- Formalize an understanding of remedy objectives.
- Promote the principle of "done right the first time" and avoids re-do loops.
- Facilitate critical decision-making through rapid elevation to resolve disputes.
- Stay within the technical and regulatory framework of the corrective action program

Discuss remedy purpose:

a. eliminate direct contact of impacted soil and groundwater
b. eliminate COC migration: PCB in soil and groundwater, VOCs in groundwater.
c. Minimize truck traffic to accommodate public comment and achieve sustainability metrics (carbon footprint, minimize transportation risk, save landfill space, etc.)
d. Develop the property for, at a minimum, enhanced native habitat open space, and in the limit as a public use park.

Remedy components:

Option 1: SOB

- PCBs in soil:
  - remove PCBs > 10ppm
  - cover remaining PCB in soil > 1 ppm with a DEM-approved soil cover (2' clean soil or equivalent)
  - Vegetate with native plants.
  - ELUR – open space in perpetuity.
  - O&M plan to both DEM and EPA.
- Groundwater: ISCO to eliminate off-site transport and restore aquifer.

Option 2: SOB w/ consideration to public comment (truck traffic concerns) and site-specific constraints (cannot uniformly achieve the 10ppm metric without significant effort)

- PCBs in soil:
  - remove PCBs > 25ppm

- cover remaining PCB in soil > 1 ppm with an engineered cap consisting of permeable geotextile and soil cover (2' clean soil or equivalent)
  - Remaining PCB < 10 ppm average
  - Vegetate with native plants.
  - ELUR – open space in perpetuity.
  - O&M plan to both DEM and EPA.
- Groundwater: ISCO to eliminate off-site transport and restore aquifer.

RIDEM

Comfortable w/ 2' cap. Would like to remove the 25 ppm to achieve 10 ppm.

- X-sections of existing PCB data
- GW data
- Calc of 95% UCL of PCB conc on surface soil if removing >25 ppm existing soil
- additional sampling of clean fill to confirm that fill is clean.